

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

IN RE:)	
)	BANKRUPTCY CASE NO.:
MODDER, INC.,)	09-01403-TOM-11
)	
BESSEMER BROWN SERVICE)	09-01406
FUNERAL HOME, LLC,)	
)	
BROWN SERVICE FUNERAL HOME,)	09-01407
LLC,)	
)	
Debtors.)	

MOTION TO CONVERT

Comes now, Robert A. Morgan, Trustee of the above estates ("Morgan") and moves this Court for an order converting these cases to proceedings under chapter 7. In support of this motion, Morgan would show this Court as follows:

1. Morgan is the duly acting and authorized Trustee of the above styled chapter 11 cases.
2. This Court has approved and the sale has closed as regards the sale of the majority of the assets of debtors and a Report of Sale has been filed with this Court. (Motion to sell Proceeding No. 1507; order approving same Proceeding No. 1531; Report of sale Proceeding No. 1543).
3. Due to the cost of proceeding in chapter 11, it is in the best interest of the estates and the creditors of same to convert these cases to proceedings under chapter 7.

WHEREFORE, Premises Considered, Morgan prays this Court will enter an order converting the above cases to proceedings under chapter 7. Morgan prays for such further and additional relief as this Court deems appropriate.

Respectfully submitted,

/s/ William Dennis Schilling
William Dennis Schilling
Attorney for Trustee

OF COUNSEL:

William Dennis Schilling
Attorney at Law
P. O. Box 55147
Birmingham, AL 35255-5147
(205) 328-0464
(205) 328-6996 fax
wdschilling@bham.rr.com